


May 23, 1985

TO: Coal File, Inspection and Enforcement Folder
FROM: David Lof, Mining Field Specialist 
RE: Genwal Coal Company, Crandall Canyon Mine, ACT/015/032,
Folder #7, Emery County, Utah

On April 30, 1985, I conducted a partial inspection at the above mentioned mine site. I was accompanied on this inspection by Tom Braidech of EPA. The purpose of this inspection was to familiarize Mr. Braidech with the mine site in order to help him with his review of the operators NPDES permit application.

Spring and Seep Inventory, NOV N85-4-7-2, #1 of 2

This violation was issued on March 14, 1985 for the operators failure to comply with Stipulation 817.52-Groundwater-(2)-DWH. The remedial action required that the operator respond to an August 17, 1984 letter from the Division requesting additional spring and seep inventory information, by June 12, 1985.

Crandall Canyon Road, NOV N85-4-7-2, #2 of 2

This violation was issued for the operators failure to construct and maintain the roads within the permit area in accordance with the approved permit and design standards. The operator must bring the roads up to design specifications by May 13, 1985.

The Class II road to the portals was mostly dry except near the top, which was due to runoff from the intake portal. The road still needs to be properly graded, cut slopes stabilized, ditch maintained and road base installed.

The Class I road was completely dry and still needs to be brought up to design specifications.

An OSM inspection report regarding an OSM inspection conducted on April 25, 1985, noted that the 24 inch diameter culvert at the beginning of the Class II road was blocked at both ends. This culvert is covered by this violation and at the time of the inspection I found that the culvert was mostly clear but still needed to be completely cleaned out.

Mine Operation Facilities, NOV N85-4-5-2, #2 of 2

This violation was issued on February 22, 1985 for the operators failure to locate and construct their mine operation facilities in accordance with their approved permanent permit. The operator is required to submit plans for the relocation of the facilities and reclamation of the present facilities location, by May 23, 1985.

Page 2
Memorandum
ACT/015/032
May 23, 1985

Portal Pad Runoff, NOV N85-4-12-3, #1 of 3

This violation was issued on April 9, 1985 for the operators failure to mine in accordance with their approved mine plan and failure to pass all surface drainage from that portion of the portal pad east of the conveyor. The operator was required to extend a temporary downspout from the existing culvert, in order to convey runoff from the pad in a controlled manner to the inlet of the cross culvert to the sediment pond, immediately. In addition they were required to submit plans to the Division by April 25, 1985 detailing how the runoff from the east end of the portal pad would be conveyed to the sediment pond in a controlled manner.

At the time of the inspection, I found that the operator had installed a flexible downspout to the culvert as required.

When I returned to the Division offices I was not able to locate any plans which were to have been submitted to abate Part A. of the violation. Because of this Cessation Order C85-4-3-1 was issued on May 2, 1985 for the operators failure to abate the violation. The Cessation Order required that the operator comply with the remedial actions of the violation immediately.

On May 7, 1985, the Division received a letter from the operator requesting an extension of time for abatement of the violation. They wanted to incorporate the runoff control plans for the portal area into the master plan being developed for the operation facilities which are due May 23, 1985 to abate NOV N85-4-5-2, #2 of 2. An extension of the time for abatement of the NOV was granted on May 8, 1985. Cessation Order C85-4-3-1 was terminated effective May 7, 1985 the date on which the Division received the letter from the operator requesting modification of the related NOV.

Upper Topsoil Stockpile, NOV N85-4-12-3, #2 of 3

This violation was issued on April 9, 1985 for the operators failure to adequately protect the upper topsoil stockpile. The operator was required to reconstruct the strawbale dike around the topsoil stockpile by April 18, 1985.

The operator had replaced some of the strawbales around the perimeter of the topsoil stockpile, but had simply set them upon existing bales. The new strawbales were not keyed in nor were they staked in place. In some areas, instead of using strawbales, the operator had constructed rock berms. The inadequacy of the actions the operator had taken were discussed with Andy King of Genwal Coal Company, during a telephone conversation on May 6, 1985 at which time he committed to installing more strawbales properly.

Noncoal Waste, NOV N85-4-12-3, #3 of 3

This violation was issued on April 9, 1985 for the operators failure to properly store and control noncoal waste materials within their permit area. The operator was required to: remove all soil materials contaminated by oil and gas spills by April 18, 1985; pick up and dispose of all garbage, old timbers, metal and other noncoal waste by April 25, 1985; and submit complete plans to the Division for storage of all materials in a controlled manner by May 4, 1985.

I found that the operator had picked up and disposed of the majority of the noncoal waste materials in the mine area. However, they had not removed all the soil materials contaminated by oil and gas spills. Because of this, this violation was included in the failure to abate Cessation Order C85-4-3-1 which was issued on May 2, 1985.

On May 7, 1985 the Division received a letter from the operator requesting a modification of the remedial actions required and extension of the time for abatement of the violation. The reason given was that the removal of contaminated soil would require moving large oil and gas storage containers which they already plan on doing later on this summer when they reconstruct their facilities site. They committed in the interim to placing oil absorbing material on the soil around and under the oil and gas storage tanks and placing containers beneath the valves of the storage tanks to catch any oil or fuel which may be accidentally spilled during the transfer of materials to other containers. Once the storage tanks are moved to their permanent locations, the operator is committed to removing all the contaminated soil materials and disposing of them in an approved land fill.

Modification and extension of the NOV were granted on May 8, 1985. Cessation Order C85-4-3-1 was terminated on May 8, 1985, effective May 7, 1985, the date of receipt of the letter from the operator requesting modification of the NOV.

Sediment Pond

The operator still needs to regrade the sediment pond embankment and associated access ramps to ensure that all disturbed area runoff goes into the pond and does not pond on top of the embankment. During my April 3, 1985 inspection, Mr. King committed to regrading the embankment and ramps as soon as the area dried out sufficiently. At the time of this inspection it appeared that the embankment was almost dry enough to be regraded.

The pond was discharging at the time of the inspection through the one inch perforation in the principal spillway. The amount of flow

Page 4
Memorandum
ACT/015/032
May 23, 1985

was less than one gallon per minute and there did not appear to be any effluent limitation violations.

Crandall Creek

Mr. Braidech and I looked at the stream above and below the sediment pond and found quite a few mayfly and caddis fly larvae on the bottoms of rocks in the stream.

re

cc: Charles Gent, Genwal Coal Company
Bill Boley, Manti La-Sal National Forest
Donna Griffin, OSM
Joe Helfrich, DOGM
John Whitehead, DOGM

Statistics

Vehicle: EX49611, 320 miles
Per Diem: None
Grant: A&E

0243Q-16-19